IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

BROOKWOOD FUNDING, LLC,

Plaintiff,

v.

AVANT CREDIT CORPORATION, AVANTCREDIT OF GEORGIA, LLC, & DOES 1-10,

Defendants.

Civil Action

File No. 1:14-cv-2960-SCJ

JOINT MOTION TO STAY

COME NOW Plaintiff Brookwood Funding, LLC ("Brookwood") and Defendants Avant Credit Corporation and AvantCredit of Georgia, LLC (collectively with Brookwood, "the Parties"), and jointly move this Honorable Court for an Order staying all case deadlines for 60 days. In support of their motion, the Parties state as follows:

- 1. The Parties have agreed to terms to resolve this dispute without further litigation and are working to prepare a settlement agreement to memorialize those terms.
 - 2. In the interim, certain case deadlines have been set.
- 3. The requested stay will provide the Parties time to memorialize their agreement without the expense of further litigation.

4. A proposed order granting this Motion is filed herewith.

WHEREFORE, the Parties jointly request the Court enter an Order staying all case deadlines for 60 days, through and including November 13, 2015.

Respectfully submitted this 14th day of September, 2015.

/s/ Ryan D. Watstein

Joseph D. Wargo Georgia Bar No. 738764 jwargo@wargofrench.com Ryan D. Watstein Georgia Bar No. 266019 rwatstein@wargofrench.com 999 Peachtree Street NE 26th Floor

Atlanta, GA 30309 Phone: (404) 853-1500 Fax: (404) 853-1501

Attorneys for Plaintiff

/s/ Gail Podolsky_

Brooke L. French
Georgia Bar No. 449989
Gail Podolsky
Georgia Bar No. 142021
CARLTON FIELDS JORDEN BURT, P.A.
1201 West Peachtree Street, N.W.
Suite 3000
Atlanta, Georgia 30309

Atlanta, Georgia 30309 Phone: (404) 815-2714 Fax: (404) 815-3415 gpodolsky@cfjblaw.com bfrench@cfjblaw.com

Jami A. Gekas
Aaron J. Weinzierl
FOLEY & LARDNER LLP
321 North Clark Street, Suite 2800
Chicago, Illinois 60654
Phone: (321) 832-5191
Fax: (312) 832-4700
Email: jgekas@foley.com
aweinzierl@foley.com

Laura Ganoza FOLEY & LARDNER LLP One Biscayne Tower 2 South Biscayne Blvd., Ste. 1900 Miami, Florida 33131 Phone: (305) 482-8409 Fax: (305) 482-8600

Email: lganoza@foley.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

Joseph D. Wargo, Esq. Ryan D. Watstein, Esq. WARGO & FRENCH LLP 999 Peachtree Street, N.E. 26th Floor Atlanta, Georgia 30309 Phone: (404) 853-1500

Fax: (404) 853-1500 Fax: (404) 853-1501 jwargo@wargofrench.com rwatstein@wargofrench.com Attorneys for Plaintiff

> /s/ Gail Podolsky Attorney for Defendants